

NOV 29 1988

US EPA RECORDS CENTER REGION 5

505M-12



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Ms. Susan Lorenz
Jacobs Engineering Group, Inc.
Environmental Services Division
222 S. Riverside Plaza
Suite 1870
Chicago, Illinois

Dear Ms. Lorenz:

This letter is to provide comment on the Draft Letter Report PRP Search for the Revere Copper and Brass Site in Detroit, Michigan. The Final Letter Report should incorporate the results of the title search for the Revere property and the comments noted below. The following are our comments on the above referenced cursory PRP Search:

Page 1-1.0 Introduction There is a distinction between the removal that was planned based on the TAT report and the emergency removal which took place based on the disposal of drums and capacitors. The introduction should mention this aspect of the site history. Also, the Office of Regional Counsel requested that an investigator be assigned to investigate who might have been responsible for the disposal of drums and capacitors which prompted the emergency removal. The Office of Criminal Investigations should be contracted to learn their findings. Please correct the spelling of Mr. Bob Bowles, the name is spelled Bowlus.

Page 2.1 Clarify Revere's operations. The reasons for possible PCB gutting could have been due to scrap scavengers. Discuss the accessibility of the site to the general public (e.g. the fishermen viewed by the OSC).

What is the status of Revereware and it's relationship to Revere Copper and Brass? Is it a financially viable corporation?

Page 2. 2.2 Insert the date of the Mary Gade letter.

-- Clarify property transactions. How did Revere "turn over" the property to CEOO/City of Detroit?

-- List both Revere Copper and Brass and the City of Detroit as PRPs.

Page 2.3 --2.4 Clarify Carter Industrials tie to the Site. Check with Office of Environmental Service Division, Pesticides and Toxic Substances Branch, to see if Carter, Histerski Public Lighting Facility or Revere had any transformers listed, as required, under TSCA.

Appendix: Please insert and list personal communications with Bob Bowlus and other sources both in the Appendix and within the text.

Please let me know if you have any questions

Sincerely,

Lisa Smith
Responsible Party/Cost Recovery Unit.

5HS-11: CERCLA:RP/CRU:11/8/88:tm:jacobing.ltr:lisa smith's disk #1

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D.S. 11/28/88

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